

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Notice of Proposed Rulemaking	)	
18 FCC Rcd 13187, 13188 ¶1 (2003)	)	ET Docket No. 03-137
	)	
And	)	
	)	
Service Rules for the Advanced Wireless Services	)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the	)	
Middle Class Tax Relief and Job Creation Act of	)	
2012 Related to the 1915-1920 MHz and	)	
1995-2000 MHz Bands ¶53 footnote 95	)	

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

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February 14, 2013

## **AFFIDAVIT OF ANNETTE JEWELL-CEDER**

State of Minnesota

Anoka County

I, Annette Jewell-Ceder, attest that my statements are true to the best of my knowledge.

**Reply** round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Annette Jewell-Ceder. My address is 4950 170<sup>th</sup> Lane NE, Ham Lake, MN 55304.
2. I am an Operational Risk Consultant for a major financial services organization.
3. I am keenly interested in seeing the Radio Frequency (RF) safety guidelines changed by the FCC. The reasons for my interest in change include both personal experience with the negative and harmful effects of RF levels to myself and my family, and documented evidence of its harmful impacts.

Documented evidence includes:

- IARC of the World Health Organization has classified radiofrequency radiation as a class 2B possible carcinogen in May 2011.
- 2012 BioInitiative Report classifies radiofrequency radiation as a carcinogen. See: <http://www.bioinitiative.org> . This report highlights evidence of pertinent and important research, including:
  - Bio effects are clearly established and occur at even very low levels of exposure to electromagnetic fields and radiofrequency radiation.
  - Bio effects with chronic exposures can reasonably be presumed to result in adverse health effects. This is because they interfere with normal body processes (disrupt homeostasis), prevent the body from healing damaged DNA, produce immune system imbalances, metabolic disruption and lower resilience to disease across multiple pathways.
  - Low exposure levels are associated with bio effects and adverse health effects at cell tower RFR exposure levels. Researchers have reported symptoms such as headaches, concentration difficulties and behavioral problems in children and adolescents; and sleep disturbances, headaches and concentration problems in adults.
  - Evidence for fertility and reproduction effects.
  - Children are even more vulnerable. There is good evidence to suggest that many toxic exposures to the fetus and very young child have especially detrimental consequences depending on when they occur during critical phases of growth and development (time windows of critical development), where such exposures may lay the seeds of health harm that develops even decades later. The American Academy of Pediatrics, in a letter to Congressman Dennis Kucinich dated December 12, 2012 states:
    - *"Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child's brain compared to an adult's brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults. It is essential that any new standards for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded through their lifetimes."*
  - The blood-brain barrier is at risk.
  - Epidemiological studies consistently show elevations in risk of brain cancers.
  - Evidence for genetic and neurological effects.
  - Evidence for childhood cancers, specifically, leukemia, due to exposure to EMF (power frequency magnetic fields) that cannot be attributed to chance, bias or confounding.
  - Evidence that high ELF MF exposure can result in decreased melatonin production.

- Strong epidemiologic evidence that exposure to ELF MF is a risk factor for Alzheimer's disease.
  - EMF and RFR make chemical toxins more harmful.
4. ELF-EMF and RFR are classified as possible cancer-causing agents. It is time for the FCC to establish new safety limits. We have the knowledge and means to save global populations from multi-generational adverse health consequences by reducing both ELF and RFR exposures. Proactive and immediate measures to reduce unnecessary EMF exposures will lower disease burden and rates of premature death.

The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. In the Telecom Act of 1996 Congress directed the FCC to set its own RF safety regulations for emissions from Personal Wireless Services Facilities. The House Committee on Commerce said it was the Commission's responsibility to adopt uniform RF regulations "with adequate safeguards of the public health and safety." (H.R. Report No. 104-204, p. 94)

US citizens and tax payers deserve radiofrequency radiation safety limits based on biology, not physics. In order for the FCC to fulfill its Congressional mandate to protect the public health and safety from harm from radiofrequency radiation it must update its RF safety regulations.

5. While the FCC does not possess the expertise to set biologically based radiofrequency radiation safety limits, the EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically based radiofrequency radiation safety limits and provide the budget and resources to carry out that task.
- 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits
6. A moratorium should be placed on sales of new spectrum, transmitting utility meter installation, and installation of additional base stations for wireless service while biologically based safety limits are being developed.

Respectfully submitted by

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